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*Attorneys for Defendant, MONIQUE CONTRERAS*

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

PEOPLE OF CITY OF LOS ANGELES  
WHO ARE UN-HOUSED, AS A  
CLASS REPRESENTED BY D.  
JACOBS, as representative of a class of  
unhoused persons who reside and resided  
in the streets and on the sidewalks of the  
City of Los Angeles,

### **Plaintiffs.**

V.

KAREN BASS, ERIC MICHAEL  
GARCETTI, PAUL KREKORIAN,  
ROBERT BLUMENFIELD, NITHYA  
RAMAN, KATY YAROSLAVSKY,  
IMELDA PADILLA, MONICA  
RODRIGUEZ, MARQUEECE-  
HARRIS-DAWSON, JOHN LEE,  
CURREN PRICE, HEATHER HÜTT,  
TRACI PARK, HUGO SOTO-  
MARTINEZ, KEVIN DE LEON, TIM  
Mc OSKER, MONIQUE CONTRERAS,  
1 "DOE" BROWN, ONE HUNDRED  
UNKNOWN NAMED DEFENDANTS,  
1-100.

## Defendants

CASE NO. 2:24-cv-09320 DOC (MAAx)  
Assigned to: Hon. Judge David O. Carter, Ronald  
Reagan Cthse, Ctrm 10A; Hon. Mag. Maria A. Audero,  
Roybal Bldg, Ctrm. 880

**DEFENDANT MONIQUE  
CONTRERAS'S REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT  
OF MOTION FOR SUMMARY  
JUDGMENT, OR  
ALTERNATIVELY, PARTIAL  
SUMMARY JUDGMENT;  
DECLARATION OF TY A. FORD;  
EXHIBITS**

[Fed. R. Civ. P. 56]

*[Filed concurrently with Notice of Motion for Summary Judgment; Separate Statement of Uncontested Facts and Conclusion of Law; Declarations of Monique Contreras and Eric Melendez w-Exhibits; Notice of Lodging Flashdrive and [Proposed] Order]*

Date: July 14, 2025  
Time: 8:30 a.m.  
Crtrm.: 10A

Trial Date: May 12, 2026  
Complaint Filed: October 29, 2024

1 **TO THE ABOVE-ENTITLED COURT AND TO PLAINTIFFS AND THEIR  
2 COUNSEL OF RECORD HEREIN:**

3 Pursuant to Federal Rule of Evidence 201(b)(2), Defendant Officer **MONIQUE**  
4 **CONTRERAS** respectfully submits this Request for Judicial notice in support of her  
5 Motion for Summary Judgment, or Alternatively, Partial Summary Judgment.

6 Defendant requests that this Court take judicial notice of the misdemeanor  
7 complaint and criminal court minute orders in *The People of the State of California v.*  
8 *David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01, which  
9 are attached to the supporting Declaration of Ty A. Ford submitted concurrently  
10 herewith.

11 This Request for Judicial Notice is made pursuant to Rule 201 of the Federal  
12 Rules of Evidence as well as *Mack v. South Bay Beer Distributors, Inc.*, 798 F.2d 1279,  
13 (9th Cir. 1986); *Lee v. City of Los Angeles*, 250 F.3d 668, (9th Cir. 2001). This request  
14 for judicial notice will be based upon the attached Declaration of Deputy City Attorney  
15 Ty A. Ford and Exhibits; Defendant's Motion for Summary Judgment, or Alternatively,  
16 Partial Summary Judgment; the pleadings and records contained in the Court's file; and  
17 any other oral and documentary evidence presented to the Court at or before the time of  
18 the hearing on this Motion.

19  
20 Dated: June 13, 2025

**HYDEE FELDSTEIN SOTO**, City Attorney  
**DENISE C. MILLS**, Chief Deputy City Attorney  
**KATHLEEN KENEALY**, Chief Assistant City Attorney  
**CORY M. BRENT**, Senior Assistant City Attorney

21 By: Ty A. Ford

22 TY A. FORD, Deputy City Attorney  
23 Attorneys for Defendant, MONIQUE CONTRERAS

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1                   MEMORANDUM OF POINTS AND AUTHORITIES

2           **I. INTRODUCTION**

3                 Federal Rule of Evidence Rule 201(b)(2) allows a Court to take judicial notice of  
4                 a fact that is not subject to reasonable dispute and is capable of accurate and ready  
5                 determination by resort to sources whose accuracy cannot reasonably be questioned.  
6                 “Facts are indisputable, and thus subject to judicial notice, only if they are either  
7                 ‘generally known’ under Rule 201(b)(1) or ‘capable of accurate and ready determination  
8                 by resort to sources whose accuracy cannot be reasonably questioned’ under Rule  
9                 201(b)(2).” *United States v. Ritchie*, 342 F.3d 903, 909 (9th Cir. 2003).

10               A Court shall take judicial notice if requested by a party and the Court is supplied  
11               with the necessary information. Fed.R.Evid. 201(c)(2).

12               In addition, the court is empowered to take judicial notice of court files and  
13               records and other public records. *See Lee v. Cty of Los Angeles*, 250 F.3d 668, 689 (9th  
14               Cir. 2001).

15               Based on the foregoing, the Court may take judicial notice of:

16               **Exhibit 5** - Copy of the Misdemeanor Complaint in the matter of *The People of*  
17               *the State of California v. David Jacobs*, Los Angeles County Superior Court Case No.  
18               24ARCM04227-01.

19               **Exhibit 6** – Copy of the criminal court’s minute order dated 09/04/24

20               **Exhibit 7** – Copy of the Mental Health Court minute order dated 09/18/24

21               **Exhibit 8** – Copy of the Mental Health Court minute order dated 10/02/24.

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1                   **Exhibit 9 – Copy of the Mental Health Court minute order dated 10/23/24.**

2                   Dated: June 13, 2025

3                   **HYDEE FELDSTEIN SOTO**, City Attorney  
4                   **DENISE C. MILLS**, Chief Deputy City Attorney  
5                   **KATHLEEN KENEALY**, Chief Assistant City Attorney  
6                   **CORY M. BRENT**E, Senior Assistant City Attorney

7                   By: *Ty A. Ford*

8                   TY A. FORD, Deputy City Attorney  
9                   *Attorneys for Defendant, MONIQUE CONTRERAS*

**DECLARATION OF TY A. FORD**

I, TY A. FORD, declare as follows:

1. I am an attorney at law, duly licensed to practice law in all the courts of the State of California, including the Central District of California. I am employed as a Deputy City Attorney for the City of Los Angeles in the Police Litigation Section. I have personal knowledge of the information set forth below, except those things set forth on information and belief, and as to those things, I believe them to be true.

2. **Exhibit “5”** attached hereto is a true and correct copy of the Misdemeanor Complaint in the matter of *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01.

3. **Exhibit “6”** attached hereto is a true and correct copy of the criminal court’s minute order dated 09/04/24

4. **Exhibit “7”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 09/18/24

5. Exhibit "8" attached hereto is a true and correct copy of the Mental Health Court minute order dated 10/02/24

6. Exhibit "9" attached hereto is a true and correct copy of the Mental Health Court minute order dated 10/23/24

7. I met and conferred with Defense Counsel, Stephen Yagman, Esq., pursuant to Central District Local Rule 7-3, on April 15, 2025.

I declare under penalty of perjury pursuant to the laws of the United States of America, and the State of California that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of June 2025 at Los Angeles, California

Ty A. Ford

TY A. FORD, Declarant